



3740 Canada Road, Lakeland, TN 38002
Tel 901.388.2423 • Fax 901.388.2348
www.oaa.org

Eyeglass Rule Comments:

Ophthalmologists and Optometrists are healthcare professionals who provide primary vision care ranging from sight testing and correction to the diagnosis, treatment, and management of vision changes. Both Ophthalmologists and Optometrists have the ability to write an accurate vision prescription for both contact lenses and spectacles.

Once a vision prescription is written, a qualified optician then determines the placement of spectacles in a fitting process that includes calculating a Pupillary Distance Measurement (PD) and a Segment Height Measurement (Seg Height) to ensure a proper fit and proper vision for a patient. These are two very distinct processes with different tools and expertise needed.

Requiring the addition of a PD Measurement to the vision prescription would force an optician by law to use that measurement even if the measurement provided is incorrect. It is essential to the health of the patient that a trained optician evaluate the vision prescription and a patient's vision history in order to ensure that the proper measurements are taken. This also leads to the question as to who would be legally responsible for the spectacles that were dispensed. Would it be the person who wrote the vision prescription with the PD Measurement or the optician who filled the prescription based on the measurement of a third party when it was incorrect?

In addition, responsibility for remaking spectacles normally falls on the dispenser (Optician) and the lens supplier. Using third party measurements would put an unfair financial burden on the actual dispensers of the spectacles to correct a third party's error in measurement, which could be passed along to the patient.

Also, requiring the addition of a PD measurement to the vision prescription would possibly require Ophthalmologists and Optometrists to purchase expensive measuring equipment which essentially makes them opticians as well as eye examiners. Ophthalmologists and Optometrists would then be forced to pass the expense of the any new equipment and the time needed to take the measurements to the patient, thus increasing the cost of an eye exam for the patient.

The Eyeglass Rule requires a patient to obtain an updated prescription more frequently than the patient feels is necessary. We advocate that a yearly eye exam is needed for the protection of the patient; however we would not be opposed to accepting a prescription written within a two-year period, unless medical circumstances require a shorter duration dictated by the prescribing Ophthalmologist and Optometrist.

We also advocate that all vision prescriptions for both contact lenses and spectacles should be verified by the prescribing Ophthalmologist and Optometrist and that this process should be

heavily enforced to ensure the safety of the patient. The Contact Lens Rule currently requires an eight hour period (business hours) for a vision prescription to be verified. The same standard should be required under the Eyeglass Rule. There is currently a loop-hole in the Eyeglass Rule that allows dispensers to fill prescriptions without this verification process, which puts the patient in harm's way.

Finally, we advocate that dispensers (Opticians) should be responsible for the measurements they personally take for the making of prescription eyewear, not Ophthalmologists and Optometrists. Thus meaning that the Pupillary Distance Measurement (PD) should be taken by a trained optician who would be making the spectacles and the PD Measurement should not be a part of a patient's written prescription in order to protect the patient from potential serious eye health risks.

Christopher M Allen
Executive Director
Opticians Association of America

Established in 1926, as the Guild of Prescription Opticians, the Opticians Association of America (OAA) consists of over 10,000 members representing all 50 States and is the only national organization representing opticianry's business, professional, educational, legislative and regulatory interests.

The Opticians Association of America's mission is to serve as the single unified voice of the profession of opticianry and to the commitment of promoting the professional stature of opticians through leadership, education, legislative representation, and communication.

The Opticians Association of America fosters, supports and sponsors programs of competency certification, licensing and continuing education for the professional development of all opticians.